

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2022-83-E

IN RE:)	
)	
Jeannie P. Brown,)	
Complainant,)	
)	DUKE ENERGY PROGRESS,
v.)	LLC’S VERIFIED ANSWER AND
)	MOTION TO DISMISS
)	COMPLAINT
Duke Energy Progress, LLC,)	
Respondent.)	

Pursuant to S.C. Code Ann. § 58-27-1990, S.C. Code Ann. Regs. 103-829 and 103-352, and applicable South Carolina law, Respondent Duke Energy Progress, LLC (“DEP” or the “Company”) hereby answers and moves the Public Service Commission of South Carolina (“Commission”) to dismiss Complainant Jeannie P. Brown’s (“Complainant”) Complaint in the above-captioned matter. The Complaint fails to allege any violation of a Commission-jurisdictional statute, rule, regulation, or order. Further, no such violation has occurred. The Company requests confidential treatment of the confidential version of this motion and its exhibits pursuant to S.C. Code Ann. Regs. 103-804(S)(2); the South Carolina Freedom of Information Act, S.C. Code Ann. § 30-4-10, et seq.; and the Family Privacy Protection Act, S.C. Code Ann. § 30-2-10, et seq., on the basis that they contain customer-specific account information. The Company also requests that the Commission hold the filing deadlines for all parties and the hearing in abeyance until this motion is resolved.

BACKGROUND

Upon information and belief, Complainant is a customer of DEP. Since DEP and Duke Energy Carolinas (“DEC”) implemented Customer Connect, certain charges that have always

existed for DEP and DEC customers—including charges for streetlighting—are now specifically itemized on customers' bills. On December 13, 2021, Complainant contacted the Company to ask about the Street Lighting Charges on her bill. On February 17, 2022, the Company determined that there is streetlighting on Complainant's street and, therefore, she was appropriately charged.

Upon information and belief, on January 26, 2022, Complainant filed a Complaint with the Commission alleging that a streetlighting charge had been added to the electric bill of each person in her neighborhood even when the person purportedly did not benefit from the street lighting. Complainant alleges that her bill has included this streetlighting charge since 1979 and she receives no benefit from the streetlights in her neighborhood.

Upon information and belief, on February 1, 2022, Commission Staff forwarded the Complaint to the South Carolina Office of Regulatory Staff ("ORS") for investigation and assistance. On February 17, 2022, Commission Staff requested clarification from ORS regarding whether ORS had closed the investigation into the Complaint. ORS confirmed it had investigated and closed the Complaint. Complainant responded that she did not consider the matter closed and alleged that the Company had found a way to "add charges to our accounts."

After reviewing the Complaint, the Company confirmed that Complainant has shared the cost of streetlighting since she moved in on June 15, 1979. The lighting agreement for her community was established on May 4, 1978 when the developer contracted to have four lights installed. There are 40 lots within Ms. Brown's community being billed for the lights, which means there is approximately one light for every 10 homes.

Complainant is currently charged for the streetlights installed in her subdivision, which are of the type Lamp: LED-No AFC, Fixture: Roadway, LUM/WT: 50. A copy of Complainant's February 2022 bill reflecting the streetlighting charge is attached hereto as Exhibit A. Pursuant to

Schedule SLR-69, a copy of which is attached hereto as Exhibit B, the amount of \$2.01 “will be added to each monthly bill rendered for residential electric service within the subdivision” with streetlights in the category of LED 50 light emitting diode in an underground distribution area where 1 light is available per 10 customers. The charge for streetlighting on Complainant’s bill is in compliance with the rates reflected in Schedule SLR-69. According to Complaint, it is also consistent with “the covenant of the neighborhood,” which “stated that if street lighting was installed[,] the owners would pay a prorated portion.”

Although the Complaint indicates that the streetlighting charge may have previously been included as part of the Basic Facilities Charge, that is not the case. Prior to the Company’s conversion to the Customer Connect system, the lighting charge was included in the electric service line of the bill. As the Commission is aware from the Company’s filings in Docket Nos. ND-2021-1-E and 2021-91-E, the Company deployed its Customer Connect platform for DEP customers on November 5, 2021. The Customer Connect platform replaced the Company’s legacy Customer Information Systems and resulted in a complete overhaul of both DEP and DEC billing system infrastructures. One result of the new billing system is that certain charges that have always existed for DEP and DEC customers, including charges for streetlighting, are now being specifically itemized on customers’ bills. The new bill format is designed to be easier for customers to read and to provide customers with more information about the charges they pay for their electric service.

ANSWER AND ARGUMENT

DEP admits the allegations of the Complaint inasmuch as Complainant alleges her bill includes a charge for streetlighting and that this charge has recently appeared on her bill. However, the Company denies all other allegations contained in the Complaint not otherwise expressly

admitted herein. As a threshold matter, the Complaint lacks sufficient specificity, as well as any factual or legal support, and fails to allege any violation of an act, rule, regulation, order, tariff, or contract. The Commission should therefore dismiss the Complaint.

It is axiomatic that complaints must include “[a] concise and cogent statement of the factual situation surrounding the complaint. If a complaint relates to an act, rule, regulation or order administered or issued by the Commission, or to a provision in a tariff or contract on file with the Commission, the act, rule, regulation, order, tariff or contract should be specifically identified in the complaint.” S.C. Code Ann. Regs. 103-824. Here, by not specifying the act, rule, regulation, or order the Company allegedly violated, Complainant failed to comply with the requirements 103-824.

As the Company has shown, the streetlighting charge reflected on Complainant’s bills complies with Commission-approved tariff SLR-69, and her subdivision possesses four streetlights for common use. And Complainant *does* derive a benefit from those streetlights. The streetlights are spaced along the single road through which one enters and exits the subdivision. As with any other streetlights, these are meant to light the streets at nighttime to assist with, among other things, safe driving. The only change to Complainant’s billing is that the Company now identifies certain charges that have always been part of its customers’ bills as individual line items. This practice—which is meant to provide clarity to customers with respect to their electric bills—does not amount to a statutory or regulatory violation, and Complainant has failed to allege any facts in the Complaint that would entitle her to relief from the Commission. Indeed, the Complaint actually states that she does not “expect any relief” and merely wanted to “bring this to the attention of the Regulatory Commission.”

In light of Complainant's statement that she is not seeking relief from the Commission, her failure to set forth any facts or law supporting her request, and her failure to allege a violation of any act, rule, regulation, order, tariff, or contract, dismissal of the Complaint is required. Pursuant to S.C. Code Ann. § 58-27-1990, a hearing in this case is not necessary in the public interest or for the protection of substantial rights.

CONCLUSION

In sum, because Complainant failed to adequately allege that DEP violated any Commission jurisdictional statute, rule, regulation, or order, the Commission should dismiss the Complaint with prejudice. DEP requests confidential treatment of the confidential version of this motion and its exhibits, requests that the Commission hold the testimony deadlines for all parties and the hearing in abeyance pending resolution of this motion, and requests such other relief as the Commission deems just and proper.

Respectfully submitted this 28th day of March 2022.

Katie M. Brown, Counsel
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Greenville, SC 29601
Telephone (864) 370-5045
katie.brown2@duke-energy.com

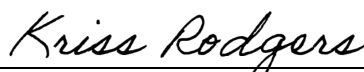
and

s/Vordman Carlisle Traywick, III
Vordman Carlisle Traywick, III
ROBINSON GRAY STEPP & LAFFITTE, LLC
Post Office Box 11449
Columbia, South Carolina 29211
(803) 929-1400
ltraywick@robinsongray.com

Counsel for Duke Energy Progress, LLC

CERTIFICATION

I, Kriss Rodgers, state and attest, under penalty of perjury, that I have reviewed the foregoing Duke Energy Progress, LLC's Verified Answer and Motion to Dismiss Complaint, and, in the exercise of due diligence, have made reasonable inquiry into the accuracy of the information and representations provided therein; and that, to the best of my knowledge, information, and belief, all information contained therein is accurate and true and contains no false, fictitious, fraudulent, or misleading statements; that no material information or fact has been knowingly omitted or misstated therein, and that all information contained therein has been prepared and presented in accordance with all applicable South Carolina general statutes, Commission rules and regulations, and applicable Commission Orders. Any violation of this Certification may result in the Commission initiating a formal review proceeding. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.



Name: Kriss Rodgers

Title: Supervisor, Consumer Affairs

Duke Energy Progress, LLC



duke-energy.com
800.452.2777

Your Energy Bill

REDACTED EXHIBIT A Page 1 of 4

Service address

MS. JEANNIE LOU BROWN
[REDACTED]
[REDACTED]

Bill date Feb 2, 2022

For service Dec 31 - Jan 31
32 days

Account number [REDACTED]

Billing summary

Previous Amount Due [REDACTED]

Payment Received Jan 31 [REDACTED]

Current Lighting Charges [REDACTED]

Current Electric Charges [REDACTED]

Products and Services [REDACTED]

Taxes [REDACTED]

Total Amount Due Feb 28 [REDACTED]

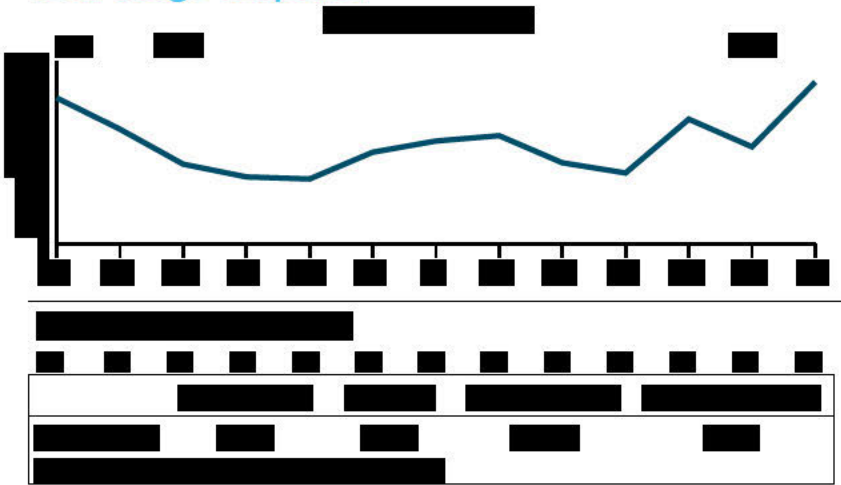


Thank you for your payment.

Winter's cold weather can bring higher energy bills. Get lots of ideas and resources to help control your energy use and save at duke-energy.com/BetterWinterBills.

Do you or someone you know need help with energy bills or other essentials as a result of the pandemic? Help is available through new and existing assistance programs for those who qualify. To get started, visit SC211.org, dial 211 or text your zip code to 898211.

Your usage snapshot



Late payments are subject to a 1.5% late charge.

Please return this portion with your payment. Thank you for your business.

Amount of automatic draft

Account number [REDACTED]

by Feb 28

Your payment is scheduled to be made by monthly automatic draft on Feb 28

\$ _____ \$ _____
Add here, to help others with a contribution to Share the Light **Amount enclosed**



Duke Energy Return Mail
PO Box 1090
Charlotte, NC 28201-1090

MS. JEANNIE LOU BROWN
[REDACTED]

Duke Energy Payment Processing
PO Box 1094
Charlotte, NC 28201-1094



duke-energy.com
800.452.2777

Account number [REDACTED]
[REDACTED]

We're here for you

Report an emergency

Electric outage
duke-energy.com/outages
800.419.6356

Convenient ways to pay your bill

Online	duke-energy.com/billing
Automatically from your bank account	duke-energy.com/automatic-draft
Speedpay	duke-energy.com/pay-now 800.452.2777
By mail payable to Duke Energy	P.O. Box 1094 Charlotte, NC 28201-1094
In person	duke-energy.com/location

Help managing your account (not applicable for all customers)

Register for free paperless billing	duke-energy.com/paperless
Home	duke-energy.com/manage-home
Business	duke-energy.com/manage-bus

General questions or concerns

Online	duke-energy.com
Home: Mon - Fri (7 a.m. to 7 p.m.)	800.452.2777
Business: Mon - Fri (7 a.m. to 6 p.m.)	866.582.6345
For hearing impaired TDD/TTY	800.676.3777 or 711
International	1.407.629.1010

Check utility rates

Check rates and charges
duke-energy.com/rates

Correspond with Duke Energy Progress (not for payment)

P.O. Box 1771
Raleigh, NC 27602

Important to know

Your next meter reading: Feb 28

Make sure we can safely access your meter. Don't worry if your digital meter flashes eights from time to time. That's a normal part of the energy measuring process.

Your electric service may be disconnected if your payment is past due

If payment for your electric service is past due, we may begin disconnection procedures. If your service is disconnected because of a missed payment, you must pay your past-due balance in full, plus a reconnection fee, before your service will be reconnected. The reconnection fee is \$19.00. A security deposit may also be required.

Electric service does not depend on payment for other products or services

Non-payment for non-regulated products or services (such as surge protection or equipment service contracts) may result in removal from the program but will not result in disconnection of electric service.

When you pay by check

We may process the payment as a regular check or convert it into a one-time electronic check payment.

Late payment charges

A late payment charge of 1.5% will be added for any past due utility balance not paid by the due date.

Para nuestros clientes que hablan Español

Representantes bilingües están disponibles para asistirle de lunes a viernes de 7 a.m. - 7 p.m. Para obtener más información o reportar problemas con su servicio eléctrico, favor de llamar al 800.452.2777.

Your usage snapshot - Continued

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]



A kilowatt-hour (kWh) is a measure of the energy used by a 1,000-watt appliance in one hour. A 10-watt LED lightbulb would take 100 hours to use 1 kWh.

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Billing details - Electric

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Your current rate is Residential Service (RES).

For a complete listing of all South Carolina rates and riders, visit duke-energy.com/rates

Billing details - Lighting

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
Total Current Charges	[REDACTED]

Your current rate is Street Lighting Service - Residential Subdivisions (SLR).

Billing details - Products and Services

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Your utility service does not depend on your payment for optional, nonregulated products or services. Failure to pay for nonregulated products or services may result in your removal from the specific program, but will not result in disconnection of your utility service.

Thank you for being a Home Protection Plan customer. Your utility service cannot be disconnected if you fail to pay the charges associated with these optional, nonregulated products or services.



duke-energy.com
800.452.2777

Account number [REDACTED]

Billing details - Taxes

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

STREET LIGHTING SERVICE
SCHEDULE SLR-69
(RESIDENTIAL SUBDIVISIONS)

AVAILABILITY

This Schedule is available for service supplied in the lighting of residential dedicated public streets by means of mercury vapor, light emitting diode, or sodium vapor lighting units installed within residential subdivisions, consisting of single or duplex dwelling units, located outside the corporate limits of a municipality at the time of the installation.

This Schedule is not available to supply service for the lighting of parking lots, shopping centers, other public or commercial areas within the residential subdivision, or areas not specifically provided for by the provisions herein.

SERVICE

The service supplied by Company will include the installation of a street lighting system, according to Company's standards and requirements, which will be owned, maintained, and operated by Company including the furnishing of the electricity required for the illumination of the lamps from dusk to dawn. Lighting units will be located by Company to provide the most uniform lighting possible in the residential area. The nominal lumen ratings of the lighting units furnished under the Monthly Rate indicate the class of lamp.

MONTHLY RATE

The following amount will be added to each monthly bill rendered for residential electric service within the subdivision:

OVERHEAD DISTRIBUTION AREA:

Bracket mounted, enclosed luminaire on approved wood pole:		
1 light per 10 customers or major fraction thereof:		
7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹		\$1.30
LED 50 light emitting diode		1.37
1 light per 5 customers or major fraction thereof:		
7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹		2.56
LED 50 light emitting diode		2.67
1 light per 3 customers or major fraction thereof:		
7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹		4.25
LED 50 light emitting diode		4.47

UNDERGROUND DISTRIBUTION AREA:

Bracket mounted, enclosed luminaire on approved wood pole:		
1 light per 10 customers or major fraction thereof:		
7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹		1.95
LED 50 light emitting diode		2.01
1 light per 5 customers or major fraction thereof:		
7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹		3.88
LED 50 light emitting diode		3.99

1 light per 3 customers or major fraction thereof:

7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹	6.46
LED 50 light emitting diode	6.68

Bracket or post mounted, enclosed luminaire on standard fiberglass or metal pole* or approved direct burial post:

1 light per 10 customers or major fraction thereof:

7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹	2.13
LED 50 light emitting diode	2.20
LED 50 light emitting diode (post-top fixture)	2.94

1 light per 6 customers or major fraction thereof:

7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹	3.50
LED 50 light emitting diode	3.59
LED 50 light emitting diode (post-top fixture)	4.80

1 light per 3 customers or major fraction thereof:

7,000 lumen mercury vapor ¹ or 9,500 lumen sodium vapor ¹	7.06
LED 50 light emitting diode	7.28
LED 50 light emitting diode (post-top fixture)	9.74

*Metal will be installed in locations where fiberglass cannot be used as determined by Company on or after January 15, 1997.

Mercury vapor units converted before November 1, 1984 to 12,000 lumen retrofit sodium vapor units, add to mercury vapor prices:

If 1 light per 10 customers:	0.15
If 1 light per 5 customers:	0.33
If 1 light per 6 customers:	0.26

¹ Mercury vapor, sodium vapor or retrofit sodium vapor fixtures are not available to new installations. For mercury vapor and retrofit sodium vapor, upon failure of the lamp, photocell, fixture or ballast, these fixtures shall be replaced at no charge with a comparable LED 50 fixture. For sodium vapor, upon failure of the fixture or ballast, these fixtures will be replaced at no charge with a comparable LED 50 fixture.

ANNEXATION CONSIDERATIONS

1. If any of the following conditions exist, the developer of the subdivision will be required to obtain from the municipal governing agency its written approval of the street lighting service being provided under this Schedule and the number and location of the lights to be installed:
 - a. The subdivision abuts a boundary of the municipality.
 - b. It is known that the subdivision will be annexed into the municipality.
 - c. The municipal governing agency has enacted a subdivision control ordinance which applies to the subdivision or any portion thereof.
2. If the subdivision is subsequently annexed, and the municipality accepts the street lighting under a street lighting service contract on the rate for the equivalent lighting unit, the following will apply:

OVERHEAD DISTRIBUTION - If the municipality accepts the street lighting service under Street Lighting Service Schedule SLS, no monthly customer charge will be applied to the subdivision residents.

UNDERGROUND DISTRIBUTION - If the municipality accepts the street lighting service under Street Lighting Service Schedule SLS and agrees to pay the contribution under the schedule for the street lighting system, no monthly customer charge will be applied to the subdivision residents. If the municipality accepts the street lighting service but does not agree to pay the contribution for the underground system, the monthly customer charges will be reduced according to the following schedule:

Lights per Customer	Pole type	Monthly Customer Charge		
		7,000 lumen	9,500 lumen	LED 50
1 light per 10	Wood	\$0.36	\$0.48	\$0.52
1 light per 10	Post, Fiberglass or Metal	\$0.43	\$0.60	\$0.51
1 light per 5	Wood	\$0.67	\$0.91	\$1.05
1 light per 6	Post, Fiberglass or Metal	\$0.72	\$1.03	\$0.85
1 light per 3	Wood	\$0.79	\$1.07	\$1.76
1 light per 3	Post, Fiberglass or Metal	\$0.84	\$1.19	\$1.74

The retrofit 12,000 Lumen Sodium Vapor units will be reduced to the corresponding reduced 7,000 Lumen Mercury Vapor Monthly Customer Charge.

3. If the subdivision is subsequently annexed, and the municipality does not accept the installed street lighting under a street lighting service contract, the service will continue to be provided under this Schedule with the applicable monthly charges.

NONREFUNDABLE CONTRIBUTION

Normally a contribution will not be required for service under this Schedule. Company will require a nonrefundable contribution from the developer under the following conditions:

1. Unusual Circumstances - In the event rock, unstable soil, or other conditions require the use of materials and methods of installation other than Company's normal materials and methods, the developer will contribute the additional cost incurred thereby.
2. Paved Areas - If Company has to install any portion of the street lighting system under existing paved areas, the developer will either cut and replace the pavement or contribute to Company the additional cost incurred to install its facilities under the paved area.
3. Excess Circuitry - When any lighting unit is located so that the span of underground cable necessary to serve such unit exceeds 250 feet, the developer will contribute the sum of the estimated installed costs of all such overages within the subdivision.

EXISTING SUBDIVISIONS

Street lighting service under this Schedule will be available in existing residential subdivisions provided Company receives a petition requesting this service signed by all the owners of residential lots within the subdivision. When the electrical distribution system within the subdivision is installed underground, the persons requesting the installation of the street lighting system will pay to Company, in addition to any contribution required above, a nonrefundable contribution equal to the cost of trenching and backfilling necessary for the installation of the street lighting system. If a contribution is required under Excess Circuitry, that portion of trenching and backfilling included in such contribution will be excluded from the preceding requirement. Re-landscaping of the area necessary due to the installation of the street

lighting system will be the responsibility of the residents within the subdivision. The appropriate monthly charge as set forth above will be applied to the monthly billings of all residents in the subdivision.

CONVERSION OF EXISTING LIGHTING SYSTEM

Street lighting installed pursuant to this schedule is subject to conversion upon request of an Applicant under the conditions stated below. An Applicant is a duly authorized representative of customers served under this Schedule with the authority to seek changes to the lighting system.

- I. Upon request of an Applicant, the street lighting may be converted to a different light type, light source or installation density provided all of the following conditions are met:
 - A. Applicant requesting a change in the street lighting system must submit a petition signed by all the owners of residential lots within the subdivision requesting the revised lighting service.
 - B. If the current lighting has been installed fewer than 20 years, Applicant must submit a payment of \$50 per fixture for fixture conversions on existing poles or \$500 per fixture if the change also involves a pole or post. If the change requires a redesign of the system layout, Applicant shall also pay any required Nonrefundable Contribution, as described in the above paragraph.
 - C. The converted lighting system must conform to the options offered under this Schedule and must be applicable to all lighting within the subdivision.
 - D. The new monthly rate shall apply immediately following completion of the revised lighting installation.
- II. Upon request of a Homeowners Association or other legal entity representing the interest of residents served under this Schedule, the street lighting may be converted to service under Street Lighting Service Schedule SLS provided all of the following conditions are met:
 - A. The Applicant must demonstrate legal authority to represent the interests of all land-owners within the subdivision. Absent this demonstration, the Applicant must submit a petition signed by all the owners of residential lots within the subdivision requesting conversion to Schedule SLS.
 - B. The Applicant must execute an Agreement for lighting service under Schedule SLS. The Agreement shall include a statement by the Applicant verifying that all residential land owners will be notified in writing prior to the conversion to lighting service under Schedule SLS and transfer of the lighting responsibilities to the Applicant. The Agreement shall also include a statement by the Applicant verifying that once service is established under Schedule SLS, the Applicant shall also be required to notify land owners in writing of any future changes to the lighting system including, but not limited to, potential disconnection of the lighting service due to nonpayment or termination of service.
 - C. The Applicant must demonstrate credit-worthiness or provide a deposit satisfactory to Company in case of default.
 - D. Following conversion of the street lighting to Schedule SLS, any change in the light type, light source or lighting design shall be made pursuant to the Outdoor Lighting Service Regulations.

RATE ADJUSTMENTS

Fuel, variable environmental, avoided capacity, and DERP avoided costs as set forth in Rider No. 39, decremental costs as set forth in the Excess Deferred Income Tax Rider EDIT, and demand side management and energy efficiency costs as set forth in Rider DSM/EE are included in the above charges and are subject to adjustment by order of the Public Service Commission of South Carolina. The rates applicable under Rider DSM/EE are provisional and are therefore subject to true-up with interest upon further review by the Office of Regulatory Staff and the Public Service Commission of South Carolina.

SALES AND FRANCHISE TAX OR PAYMENT IN LIEU THEREOF

To the above charges will be added any applicable South Carolina sales tax, and for those customers within any municipal or other local governmental jurisdiction, an appropriate amount to reflect any franchise fee, business license tax, or similar percentage fee or tax, or charge in lieu thereof imposed by such entity.

PAYMENTS

The monthly charges set forth under this Schedule will be billed in conjunction with the normal bill for residential service. The total of the bill so rendered shall be subject to the terms and conditions of the Service Regulations approved and on file with the state regulatory commission. Failure to pay the total bill rendered when due and payable shall constitute a failure to pay the bill for residential service.

CONTRACT PERIOD

The applicable monthly charge set forth in this Schedule shall be applied to the monthly billings of all residents in the subdivision as long as street lighting service is provided under any of the conditions as set out herein.

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2022-83-E

Jeannie P. Brown,)
)
Complainant/Petitioner,)
)
v.)
)
Duke Energy Progress, LLC,)
)
Defendant/Respondent.)
)

CERTIFICATE OF SERVICE

This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson Gray Stepp & Laffitte, LLC, have this day caused to be served upon the person(s) named below the **Verified Answer and Motion to Dismiss Complaint on behalf of Duke Energy Progress, LLC** in the foregoing matter by electronic mail and/or by placing a copy of same in the U.S. Mail addressed as follows:

Jeannie P. Brown
2001 Herring Place
Florence, SC 29506
Jbs.mail@sc.rr.com

Roger P. Hall, Counsel
SC Department of Consumer Affairs
P.O. Box 5757
Columbia, SC 29250
Rhall@scconsumer.gov

Andrew M. Bateman, Counsel
SC Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
abateman@ors.sc.gov

Dated at Columbia, South Carolina this 28th day of March, 2022.

